

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STEEL, PAPER AND FORESTRY, )  
RUBBER, MANUFACTURING, ENERGY, )  
ALLIED INDUSTRIAL AND SERVICE )  
WORKERS INTERNATIONAL UNION, )  
AFL-CIO-CLC, *et al.*, )

Plaintiffs, )

v. )

KELSEY-HAYES COMPANY, TRW )  
AUTOMOTIVE, INC., and TRW )  
AUTOMOTIVE HOLDINGS CORP., )

Defendants. )

CASE NO. 4:11-cv-15497

JUDGE GERSHWIN DRAIN

---

Stuart M. Israel (P15359)  
John G. Adam (P37205)  
LEGGHIO & ISRAEL, P.C.  
306 South Washington, Suite 600  
Royal Oak, MI 48067  
Telephone: (248) 398-5900  
Email: israel@legghioisrael.com  
jga@legghioisrael.com

*Attorneys for Plaintiffs*

Joseph P. Stuligross  
Cara Krueger  
USW International Union  
Five Gateway Center  
Pittsburgh, PA 15222  
(412) 562-2533  
Email: jstuligross@usw.org  
ckrueger@usw.org

*Attorneys for Plaintiff USW*

Gregory V. Mersol (OH 0030838)  
Todd A. Dawson (OH 0070276)  
BAKER & HOSTETLER LLP  
Key Tower  
127 Public Square, Suite 2000  
Cleveland, OH 44114-1214  
Telephone: (216) 621-0200  
Facsimile: (216) 696-0740  
Email: gmersol@bakerlaw.com  
tdawson@bakerlaw.com

*Attorneys for Defendants*

---

**DEFENDANTS' NOTICE OF APPEAL**

---

Notice is hereby given that defendants Kelsey-Hayes Company, TRW Automotive Inc., and TRW Automotive Holdings Corp., which are all of the defendants in the above-named case, hereby appeal to the United States Court of Appeals for the Sixth Circuit from the Order and Final Judgment entered in this action on January 28, 2016, and from all prior or other judgments and orders rendered in this case.

Respectfully submitted,

s/ Gregory V. Mersol

GREGORY V. MERSOL (0030838)

[gmersol@bakerlaw.com](mailto:gmersol@bakerlaw.com)

TODD A. DAWSON (0070276)

[tdawson@bakerlaw.com](mailto:tdawson@bakerlaw.com)

BAKER & HOSTETLER LLP

KEY TOWER

127 PUBLIC SQUARE, SUITE 2000

CLEVELAND, OH 44114-1214

TELEPHONE: (216) 621-0200

Telephone: (216) 621-0200

Facsimile: (216) 696-0740

*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2016, a copy of the foregoing was filed electronically.  
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.  
Parties may access this filing through the Court's system.

s/ Gregory V. Mersol  
One of the Attorneys for *Defendants*